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12 *Attorneys for Defendants*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 CLARK COUNTY, NEVADA,

16 Plaintiff,

17 v.

18 ORBITZ WORLDWIDE, LLC; ORBITZ,  
19 LLC; ORBITZ, INC.; TRAVELSCAPE, LLC;  
20 TRAVELOCITY, INC.; CHEAP TICKETS,  
21 INC.; EXPEDIA, INC.; EXPEDIA GLOBAL,  
22 LLC; HOTELS.COM, LP; HOTWIRE INC.;  
23 BOOKING HOLDINGS INC.;  
24 PRICELINE.COM LLC; TRAVELWEB LLC;  
25 TRAVELNOW.COM, INC.; AGODA  
26 INTERNATIONAL USA LLC; HOTEL  
TONIGHT, INC.; HOTEL TONIGHT, LLC;  
27 DOES I through XXX, inclusive and ROE  
BUSINESS ENTITIES I through XXX,  
inclusive,

Defendants.

CASE NO.: 2:21-cv-1328-JCM-VCF

**STIPULATION AND ORDER  
REGARDING RESPONSE TO  
COMPLAINT**

28 Plaintiff Clark County, Nevada (“Plaintiff”) and Defendants Orbitz Worldwide, LLC,  
29 Orbitz, LLC, Orbitz, Inc., Travelscape, LLC, Travelocity, Inc., Cheap Tickets, Inc., Expedia, Inc.,  
30 Expedia Global, LLC, Hotels.com, LP, Hotwire Inc., Booking Holdings Inc., Priceline.com LLC,  
31 Travelweb LLC, TravelNow.com, Inc., Agoda International USA LLC, Hotel Tonight, Inc., and  
32

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1 Hotel Tonight, LLC ("Defendants"), by and through their undersigned counsel, hereby stipulate  
2 and agree as follows:

3 1. On May 14, 2021, Plaintiff filed a civil action captioned *Clark County v. Orbitz*  
4 *Worldwide, LLC, et al.*, Case No. A-21-834681-C in the State of Nevada Eighth Judicial District.

5 2. Defendants removed this action to this Court on July 13, 2021.

6 3. The parties have met and conferred and agree that, assuming that this case is not  
7 remanded to the Eighth Judicial District Court in and for Clark County, Nevada, Defendants may  
8 have sixty (60) days from the date of removal to answer or otherwise respond to the Complaint.  
9 Therefore, Defendants' deadline to respond to the Complaint shall be September 13, 2021.

10 4. Plaintiff's agreement as set forth herein does not constitute a waiver of any  
11 argument relating to the appropriateness of the removal of this matter to this Court and is without  
12 prejudice to Plaintiff's right to move or seek from this Court an order for remand on any and all  
13 proper legal bases.

14 5. The parties represent that this stipulation is sought in good faith, and they  
15 respectfully suggest that good cause exists to enter the above-noted briefing schedule.

16 DATED this 2nd day of August, 2021.

DATED this 2nd day of August, 2021.

17 PISANELLI BICE PLLC

CLARK HILL PLLC

18 By: /s/ Jordan T. Smith

By: /s/ Mark S. Dzarnoski

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25 IT IS SO ORDERED.



26 Cam Ferenbach

27 United States Magistrate Judge

8-9-2021

Dated: \_\_\_\_\_